

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BETTY BASTIDAS, et al.  
RANDY XU, et al.  
EMILY SLOAN, et al.  
GWYNN GALITZER,  
NIKOLAS SIKELIANOS,

05 Civ. 7670 (KMK)(JCF)  
05 Civ. 7672 (KMK) (JCF)  
05 Civ. 7668 (KMK)(JCF)  
05 Civ. 7669 (KMK)(JCF)  
05 Civ. 7673 (KMK)(JCF)

Plaintiffs,

ECF CASE

-against-

THE CITY OF NEW YORK, et al.

Defendants.  
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**DECLARATION OF JEFFREY ROTHMAN IN SUPPORT OF PLAINTIFFS'  
MOTION FOR AN ORDER PERMITTING PLAINTIFFS IN THE BASTIDAS, ET AL.  
CASE TO FILE A SECOND AMENDED COMPLAINT, PERMITTING PLAINTIFFS IN  
THE XU, ET AL. CASE TO FILE A SECOND AMENDED COMPLAINT, PERMITTING  
PLAINTIFFS IN THE SLOAN, ET AL. CASE TO FILE A SECOND AMENDED  
COMPLAINT, PERMITTING PLAINTIFF GWYNN GALITZER TO FILE A SECOND  
AMENDED COMPLAINT IN THE GALITZER CASE, AND PERMITTING PLAINTIFF  
NIKOLAS SIKELIANOS TO FILE A FIRST AMENDED COMPLAINT  
IN THE SIKELIANOS CASE.**

Jeffrey Rothman, an attorney duly admitted to practice in this Court, pursuant to 28  
U.S.C. § 1746, declares as follows:

1. I am counsel for plaintiffs in the above captioned actions and submit this  
declaration in support of Plaintiffs' motion for for an order permitting plaintiffs in the Bastidas,  
et al. case to file a Second Amended Complaint, permitting plaintiffs in the Xu, et al. case to file  
a Second Amended Complaint, permitting plaintiffs in the Sloan, et al. case to file a Second  
Amended Complaint, permitting plaintiff Gwynn Galitzer to file a s Second Amended Complaint  
in the Galitzer case, and permitting plaintiff Nikolas Sikelianos to file a First Amended

Complaint in the Sikelianos case.

2. The following exhibits, cited in support of plaintiffs' motion for leave to amend, are attached hereto:

- Exhibit A** Proposed First Amended Complaint in Bastidas (a version with red "track changes" is included along with the final version for the Court's convenience)
- Exhibit B** Proposed Second Amended Complaint in Xu (a version with red "track changes" is included along with the final version for the Court's convenience);
- Exhibit C** Proposed First Amended Complaint in Sloan (a version with red "track changes" is included along with final version for the Court's convenience);
- Exhibit D** Proposed First Amended Complaint in Galitzer (a version with red "track changes" is included along with final version for the Court's convenience);
- Exhibit E** Proposed First Amended Complaint in Sikelianos (a version with red "track changes" is included along with final version for the Court's convenience);

Dated: New York, New York  
August 31, 2007

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